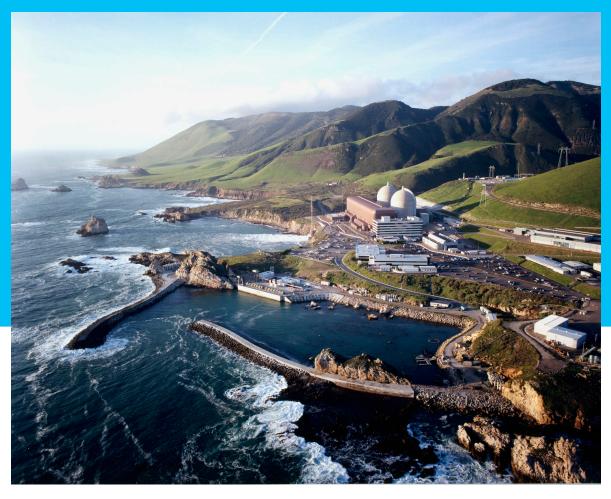
**DCPP Potential Continued Operations** 

**Overview** 

**September 28, 2022** 

Tom Jones, Senior Director, Regulatory, Environmental, & Repurposing



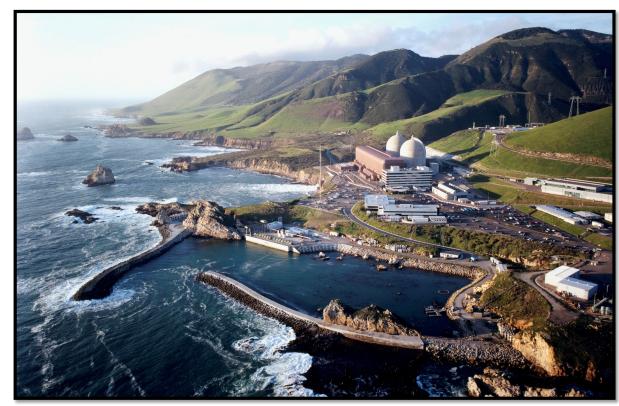




## **Background**

Operating licenses DPR-80 and DPR-82

- Two units: generate3,411 MWt each
  - 9% of CA's energy
  - Approx. 20% of CAGHG free
- Current operating licenses expire:
  - Unit 1: November 2024
  - Unit 2: August 2025





## **Background**



- Jun. 29: State Assembly Bill 180 passed to provide the Department of Water Resources funding to contract with utilities to preserve the option to keep retiring plants open
  - Governor signed into law on Jun 30



- Sep. 1: State Senate Bill (SB) 846 passed directing PG&E to take all necessary actions to preserve the option to extend operations to Oct 2029 (Unit 1) and Oct 2030 (Unit 2)
  - Governor signed into law on Sep 2



#### **Immediate Actions Needed**

Why is Action Needed Now? The following critical activities require action in 2022 to operate DCPP beyond 2024 (Unit 1) and 2025 (Unit 2)

- 1. Fuel Purchasing: Two-year lead time currently no fuel for Unit 1 in 2024
- 2. Spent Nuclear Fuel Storage: Two-year lead time to contract, manufacture, transport, and load canisters to support continued core reloads
- 3. Regulatory Processes: Initiate complex federal and state applications for permits and funding including US Dept. of Energy (DOE) grant application process
- 4. Project Team: Restart license renewal (LR) application preparation, inspection program development, and implementation of LR NRC commitments as directed by SB 846



**SB 846** 

**Enacted** 

(Sep 2, 2022)

# **Concurrent Paths Due to California Energy Policy Changes**

#### 1. DCPP Retirement 2024/2025

- Continue key decommissioning planning to secure items already in progress
  - Diablo Canyon Decommissioning Engagement Panel
  - San Luis Obispo County: Decommissioning development planning
  - Nuclear Regulatory Commission (NRC): Decommissioning license actions
  - CA Public Utilities Commission: Nuclear Decommissioning Cost Triennial Proceedings
  - Diablo Canyon land activities

## 2

## 2. DCPP Continued Operations

- Immediately re-start DCPP LR efforts
- Conduct lifecycle evaluations
- Evaluate employee retention





#### **NRC License Renewal Process**

#### NRC Governing Laws

- Atomic Energy Act (safety)
- National Environmental Policy Act (NEPA; environmental)

#### NRC License Renewal Process

Fundamental premise of LR is the plant's current licensing basis provides reasonable assurance of the protection of public health and safety

- Safety review
  - · Focus is on the effects of aging of components and structures
  - NRC review determines whether aging effects will be effectively managed
- Environmental review (NEPA)
  - Considers, analyzes, and discloses environmental impacts of continued plant operation for up to an additional 20 years
  - NRC review determines if the environmental impacts of LR are so great that license renewal would be unreasonable



#### **NRC License Renewal Process**

#### Big Picture

- Looks at system, structure, and component health (ensuring components will function as designed)
- Assigns programs to monitor aging, not prevent aging
  - · e.g., periodically inspect inside and outside of piping

## Completed 80%-90% of NRC review process for DCPP

- Application submitted in 2009; annual updates submitted 2010-2016
- Application withdrawn in 2018

#### Path Ahead

Align with NRC on appropriate and expeditious regulatory path for LR process



#### **Seismic Considerations**

#### Current DCPP operations: Seismic studies and evaluations are on-going

- PG&E maintains a Long-Term Seismic Program (LTSP) which includes continuous evaluation and monitoring of seismic studies and events by the PG&E Geosciences Department (includes consultation with industry experts and academia)
- PG&E has annual meetings with the CPUC's Independent Peer Review Panel (IPRP), including presentation of continued activities of the LTSP

#### DCPP LR: No new seismic studies required for NRC

- Fundamental premise of LR is the plant current licensing basis provides reasonable assurance of the protection of public health and safety – LTSP will continue if license is extended
- Post-Fukushima, PG&E conducted extensive, peer-reviewed geotechnical investigations in the region to characterize the seismic conditions with state-of-the-art equipment
- NRC determined that no plant systems, structures, and components important to safety were in need of updating to protect against earthquakes

#### • SB 846 requires the DWR loan agreement to include, among other things:

- "(13) A covenant that the operator shall conduct an updated seismic assessment."



#### **DCISC Considerations in SB-846**

- DCISC continues into extended operations (Public Utilities Code (PUC) section 712.1)
  - DCISC shall cease operations no sooner than when the NRC operating licenses cease and when all spent nuclear fuel has been moved to the DC ISFSI
- Specifies additional DCISC roles (PUC section 712.8(c)(2)(B))
  - Consult with and incorporate into its assessments and recommendations the Independent Peer Review Panel
  - Transmit annually its findings and recommendations for improved safety to the Legislature, Governor, CPUC, Energy Commission, NRC, and PG&E
    - DCISC annual reports will inform the CPUC's decision on DCPP continued operations (in particular, findings on "seismic safety or issues of deferred maintenance")



## **Key Take-aways**

- SB 846 directs PG&E to take all necessary actions to preserve the option to extend operations for five additional years
- PG&E submitted an application to the US DOE on Sep. 2 requesting grant funds
- PG&E is pursuing concurrent work paths
- DCPP seismic safety will continue to be maintained
- DCISC will continue into extended operations with additional roles

## **Questions?**

Tom Jones Tom.Jones@pge.com

